

# **EXHIBIT F**

1 A. Yes.

2 Q. What address are you registered to vote  
3 at?

4 A. I believe at my home address.

5 Q. Okay. Is this -- how long have you been  
6 registered to vote at that address?

7 A. Since 2016.

8 Q. And more generally how long have you been  
9 registered to vote for?

10 A. Since I was eighteen.

11 Q. What political party are you registered  
12 for?

13 MS. ROEHRS: Objection.

14 A. I honestly don't remember at the moment.

15 Q. Did you vote in the 2020 presidential  
16 election?

17 A. Yes.

18 Q. Did you vote in person or by mail?

19 A. In person.

20 Q. Prior to November of 2020 had you voted in  
21 person in any other elections before?

22 A. Yes.

23 Q. How many, approximately?

24 A. I regularly voted in general elections  
25 since I was registered to vote.

1 says, don't be finessed to giving your private  
2 information, stay safe and beware of vote by mail.  
3 What about this statement in particular do you  
4 believe to be false?

5 A. Beware of vote by mail.

6 Q. So, the statement of beware of vote by  
7 mail, you believe to be a false statement?

8 MS. ROEHRS: Objection.

9 A. I believe it to be intimidating, so, yes.

10 Q. What specifically do you believe about it  
11 is intimidating?

12 A. The admonition to stay safe and to beware.

13 Q. Specifically, do you feel that that is an  
14 intimidating statement?

15 MS. ROEHRS: Objection.

16 A. Absolutely. It implies that there is  
17 something unsafe and something to be wary of.

18 Q. So, by telling someone -- is it your  
19 testimony by telling someone to stay safe, that that  
20 is an intimidating statement?

21 MS. ROEHRS: Objection.

22 A. No.

23 Q. Were you personally intimidated by the  
24 robocall?

25 MS. ROEHRS: Objection.

1 A. Yes.

2 Q. How so?

3 A. I found that it sounded very scary and  
4 threatening and made me not sure that I could trust  
5 that methods of voting were not being targeted for  
6 partisan reasons.

7 Q. So, you recognized, is it fair to say --

8 MR. KLEINMAN: Withdrawn.

9 Q. When you received the robocall you  
10 believed its contents to be false though, correct?

11 A. Correct.

12 Q. Okay. Yet, is fair to say that you were  
13 never the less intimidated by what you believed to  
14 be false statements?

15 MS. ROEHRS: Objection.

16 A. The fact that someone would go to efforts  
17 to create this call made me very concerned about  
18 whether or not there would be tampering.

19 Q. Do you think there was any legitimacy  
20 behind those concerns about tampering?

21 MS. ROEHRS: Objection.

22 A. I don't know.

23 Q. Is it fair to say you'd be grateful if  
24 there was truth behind the fact that your vote could  
25 be tampered with and you were warned about such

1 A. Correct.

2 Q. And prior to receiving the robocall you  
3 had --

4 MR. KLEINMAN: Withdrawn.

5 Q. Prior to receiving the robocall did you  
6 hear any report about any kind of concern, other  
7 people expressing concerns about mail-in voting?

8 MS. ROEHRS: Objection.

9 A. I don't remember.

10 Q. Did you read any literature or anything  
11 regarding mail-in voting prior to receiving the  
12 robocall?

13 MS. ROEHRS: Objection.

14 A. I don't remember.

15 Q. Why did you vote in-person in the 2020  
16 presidential election?

17 A. Because it seemed like the safest option.

18 Q. Why did it seem like the safest option?

19 A. Because I could watch my ballot be  
20 counted.

21 Q. Okay. So, is it fair to say that you  
22 thought voting in person was safer than voting by  
23 mail?

24 A. Yes.

25 Q. Did your decision to vote in person have

1 there are many aspects of the lawsuit as I read it.

2 Q. What do you believe those aspects to be?

3 MS. ROEHRS: Objection.

4 A. There were racial components. There was  
5 also, there are aspects that affect many types of  
6 demographics in our country. Some, perhaps a lot,  
7 may also overlap along racial lines. The fear  
8 mongering about vaccines obviously affects all of us  
9 because it was during the pandemic.

10 Q. What specifically do you believe was part  
11 of the robocall that was racially motivated?

12 MS. ROEHRS: Objection.

13 A. I'm not sure.

14 Q. Okay. At the time you received the  
15 robocall did you recognize the name Tamika Taylor?

16 A. No.

17 Q. Have you performed any independent  
18 research on mail-in voting?

19 MS. ROEHRS: Objection.

20 A. No.

21 Q. Do you know what happens to the personal  
22 information of an individual who utilizes. Mail-in  
23 voting?

24 MS. ROEHRS: Objection.

25 A. No.

1 Q. In that time period I just referenced  
2 between August of 2020 and March of '21, how  
3 frequently would you go for walks?

4 A. I don't remember.

5 Q. Was it on a daily basis or something  
6 different?

7 MS. ROEHRS: Objection.

8 A. Possibly something different.

9 Q. Was it on a weekly basis?

10 A. I do not remember.

11 Q. Are you aware that on October 28, 2020,  
12 the Court ordered my clients to issue a corrective  
13 robocall?

14 A. That sounds familiar, yes.

15 Q. Do you recall whether or not you received  
16 this call?

17 A. I think so.

18 Q. Do you recall the substance of this call?

19 A. No.

20 Q. What effect, if anything, did this Court  
21 ordered robocall have on you?

22 A. I don't remember. I don't know.

23 Q. As a result of the robocall did you  
24 sustain any psychological or emotional injuries?

25 A. Can you define?

1 Q. Sure. Were you diagnosed with any type of  
2 psychological or mental or emotional disorder as a  
3 result of the robocall?

4 A. No.

5 Q. Have you sought any type of mental health  
6 treatment as a result of the robocall?

7 A. No.

8 Q. As a result of voting in person did you  
9 sustain any physical injuries?

10 A. No.

11 Q. Did you contract Covid at any point in  
12 time --

13 MR. KLEINMAN: Withdrawn.

14 Q. Within the two weeks following the  
15 November 2020 presidential election did you contract  
16 Covid?

17 A. No.

18 MR. KLEINMAN: I'm going to put up on the  
19 screen what's been marked as Defendant's  
20 Exhibit O.

21 (Whereupon, Defendants' Exhibit  
22 O, being a email document, is  
23 displayed.)

24 MR. KLEINMAN: Can you see what's on the  
25 screen, Ms. Winter?